

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE
OFFICE

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF
UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OCA/USPS-311
(January 17, 2002)

The United States Postal Service hereby moves for late acceptance of its response to interrogatory OCA/USPS-311 filed on December 14, 2001. This delay was caused by a concatenation of administrative oversight, the press of other client business, the ongoing need to educate individuals facing the possibility of a RIF with the demands of a rate case, and the need to coordinate among clients who are being reorganized. The Postal Service regrets any inconvenience but does not believe that any party has been prejudiced by this delay, especially with the few issues challenged

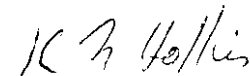
by any opposition to the settlement agreement and the fact that so much information responsive to this interrogatory has already been provided.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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January 17, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Kenneth N. Hollies

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